

EXHIBIT 2

UNITED STATES DISTRICT COURT
IN THE WESTERN DISTRICT OF MICHIGAN

BRUCE CRAIGIE and
BARBARA CRAIGIE,

Plaintiffs,

Case No. 1:15-cv-441

Judge Janet T. Neff

v.

NATIONSTAR MORTGAGE, LLC, a limited
liability company, and JOHN DOES 1-5,
unnamed individuals,

Defendants.

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**OBJECTIONS AND RESPONSES TO PLAINTIFFS' SECOND SET OF DISCOVERY
REQUESTS TO DEFENDANT NATIONSTAR MORTGAGE LLC**

Nationstar Mortgage LLC ("Nationstar") submits the following objections and responses to Plaintiffs' Second of Discovery Requests To Defendant Nationstar Mortgage LLC:

DEFINITIONS

1. The terms "Plaintiffs" or "you" refer to Bruce Craigie and Barbara Craigie.
2. The term "Defendant" or "Nationstar" refers to Nationstar Mortgage LLC.
3. The term "Scenic Drive Loan and Mortgage" refers to the loan (loan number: 0596863531) extended to Plaintiffs secured by a mortgage against real property commonly known as 2985 Scenic Drive, Muskegon, MI 49445.

4. The term "Lake Drive Loan and Mortgage" refers to the loan (loan number: 0596863530) extended to the Plaintiffs secured by a mortgage against real property commonly known as 1625 Lake Drive SE, East Grand Rapids, MI 49506.

5. The term "Loans" refers to the Lake Drive Loan and the Scenic Drive Loan collectively.

6. The term "Mortgages" refers to the Lake Drive Mortgage and the Scenic Drive Mortgage.

7. The term "Loan Documents" refers to the documents evidencing the Loans.

8. The term "Trustee" refers to the Bank of New York Mellon f/k/a The Bank of New York, as Trustee for the Holders of the Certificates, First Horizon Mortgage Pass Through Certificates Series FHAMS, 2006-FA4, by First Horizon Home Loans, a division of First Tennessee Bank National Association, Master Servicer, in its capacity as agent for the Trustee under the Pooling and Servicing Agreement.

GENERAL OBJECTIONS

1. Nationstar objects to Plaintiffs' discovery requests to the extent that they are overly broad, unduly burdensome, repetitive, irrelevant or not reasonably calculated to lead to the discovery of admissible evidence.

2. Nationstar objects to Plaintiffs' requests to the extent that they purport to impose any obligation on it beyond the requirements imposed by the Federal Rules of Civil Procedure.

3. Nationstar objects to those discovery requests that improperly seek the disclosure of information or documents that are privileged or confidential, that were prepared in anticipation of litigation or constitute attorney work product, or that are otherwise immune from discovery. Inadvertent production of such information or documents shall not constitute a waiver of any privilege or any other ground for objection to discovery with respect to any other

information or documents. Nationstar reserves the right to demand the return of any such documents.

4. Nationstar objects to those discovery requests that are compound, vague, ambiguous or otherwise unclear as to the precise information or documents sought.

5. Nationstar's responses are based on the best information presently available, and it reserves the right to amend or to supplement its answers if it obtains other or additional information or discovers other or additional documents, but states that it is not obligated to produce documents created after the date of its discovery requests.

REQUESTS FOR ADMISSION

1. Admit that Nationstar is a "debt collector" as that term is used in the Fair Debt Collection Practices Act.

ADMIT OR DENY: Nationstar objects to this request as it calls for a legal conclusion. To the extent a response is required, Nationstar denies the request as untrue. Nationstar admits only that in August 2011, Nationstar began servicing the Loans, as a subservicer for First Horizon, the servicer of Plaintiffs' Loans, which began servicing the Loans prior to Plaintiffs' default of their Loans obligations.

2. Admit that Nationstar attempted to collect debts from Bruce Craigie which he owed to one or more persons or corporations other than Nationstar.

ADMIT OR DENY: Nationstar admits only that it attempted to collect payments from Bruce Craigie, which he owed pursuant to the Loan Documents, as the servicer of Loans.

3. Admit that Nationstar's attempts to collect debts from Bruce Craigie included engaging counsel in Michigan and instructing such counsel to foreclose on Lake Drive and Scenic Drive.

ADMIT OR DENY: Nationstar admits that in the course of servicing the Loans, it retained counsel in Michigan to exercise the Trustee's contractual rights and remedies under the Loan Documents.

4. Admit that Nationstar's principal business is mortgage loan servicing.

ADMIT OR DENY: Nationstar admits only that it services mortgage loans.

5. Admit that Nationstar's business includes obtaining servicing rights to mortgage loans subsequent to those mortgage loans becoming delinquent.

ADMIT OR DENY: Nationstar admits only that it has obtained servicing rights to mortgage loans, which at times include loans that are in default under the respective loan documents.

6. Admit that Nationstar's business entails soliciting servicing rights from holders of mortgage loan indebtedness.

ADMIT OR DENY: Nationstar objects to this request as it is vague and ambiguous as "soliciting" is not defined. Subject to and without waiving any objections, Nationstar denies the request as untrue.

7. Admit that on February 26, 2014, Nationstar closed its loan modification "case" with respect to Lake Drive without either granting or denying the Modification Request.

ADMIT OR DENY: Nationstar objects to this request as it is vague and ambiguous as "closed" is not defined. Subject to and without waiving any objections, Nationstar denies the request as untrue.

8. Admit that with respect to Bruce Craigie's HAMP Modification Request submitted to Nationstar on March 8, 2014, Nationstar did not grant or reject the Modification Request on or before April 2, 2014.

ADMIT OR DENY: Nationstar states that Plaintiffs sent certain documents to Nationstar via fax on March 8, 2014, at 10:09 p.m. (the "Faxed Documents"). Nationstar admits only that it did not communicate with Plaintiffs regarding those Faxed Documents before April 2, 2014. Further answering, Nationstar admits that it notified Plaintiffs that their request for a loan modification was incomplete.

9. Admit that with respect to Bruce Craigie's HAMP Modification Request submitted to Nationstar on March 8, 2014, Nationstar did not send any written request asking Bruce Craigie to supply required information.

ADMIT OR DENY: Denied as untrue. Nationstar states that it requested specific documentation and information from Plaintiffs by letter dated February 21, 2014, but that Plaintiffs did not provide all of the requested information/documents on or before March 8, 2014. Further answering, Nationstar incorporates its response to Interrogatory No. 4.

INTERROGATORIES

1. To the extent Your answer to any of the foregoing Requests for Admission is anything other than an unqualified admission, explain in detail the basis for Your denial or failure to admit and Identify any Documents which support Your denial or failure to admit.

RESPONSE: Nationstar refers Plaintiffs to its responses to the Requests for Admission.

2. Identify by name, title, department and business address each person providing or assisting in providing answers to the foregoing Requests for Admission and these Interrogatories.

RESPONSE: These Answers are verified by a representative of Nationstar. See Verification. Additionally, counsel for Nationstar assisted in the preparation of the Responses.

3. Identify by name, and provide the title, department, business address, current or last known home address, current or last known telephone number, and whether he or she is a current Nationstar employee, the following persons as identified in Nationstar's "COLLECTION HISTORY PROFILE" documents for Lake Drive and Scenic Drive:

RESPONSE: Nationstar objects because this request seeks information not relevant to the subject matter of the litigation nor reasonably calculated to lead to the discovery of admissible evidence and because this request seeks personal/confidential information of individuals protected from disclosure. Subject to and without waiving any objections, Nationstar provide the following information upon its reasonable search for responsive information:

| | FULL NAME | TITLE | DEPARTMENT | Current Employee |
|------------|---------------------|--------------------------------|---|------------------|
| TJOHNSON | Tremea Johnson | Investor Services Specialist | Investor Accounting Finance and Performing Servicing | No |
| NMILDENBER | Nicole Mildenber | Dedicated Loan Specialist | PLS Loss Mitigation - Servicing | No |
| NUPERESA | Nicole Uperesa | Dedicated Loan Specialist | PLS Loss Mitigation Servicing | Yes |
| PPATEL4 | Priti Patel | Underwriter III | Green Light Retail UW Originations | No |
| ITORRES | Irma Torres | Customer Service Rep I | Operational Risk Servicing | No |
| RSTEPHAN | Rachel Stephan | Avp Foreclosure Prevention | PLS Loss Mitigation Servicing | Yes |
| IRUMP | Irene Rump | Portfolio Oversight Specialist | PLS Loss Mitigation Servicing | Yes |
| KBROEREN | Kate Broeren | Dedicated Loan Specialist | PLS Loss Mitigation Servicing | No |
| PBURNS | Pearl Burns | Sr. Loan Modification Spec. | Non Performing Servicing | Yes |
| ARAV1036 | Aishwarya Ravindran | Foreclosure Specialist | TCS "Third Party" Job Code FOSP | Yes |
| KFULTON | Kevin Fulton | Customer Relations Spec. Ii | Customer Relations Ops Support | Yes |
| GELBOURINI | Gi-Hann El-Bourini | Dedicated Loan Specialist | PLS Loss Mitigation Servicing | Yes |
| MTRAYLOR | Markus Traylor | Customer Relations Manager | Customer Relations Ops Support | Yes |

With respect to the remaining individuals requested (AB, PSMITH2, KS1034, SMAHARANA, LEllison), Nationstar is continuing its search for responsive information and intends to supplement its response to this interrogatory at a later date.

4. Identify any and all Documents You believe were requested in Nationstar's February 21, 2014 letter to Bruce Craigie in connection with a HAMP application, but were not received by Nationstar on or before March 8, 2014.

RESPONSE: Nationstar objects to this request as the letter dated February 21, 2014 is a written document that speaks for itself. Subject to and without waiving any objections, Nationstar states that by letter dated February 21, 2014, it requested that Plaintiffs return a complete Request for Mortgage Assistance ("RMA") form, but that Plaintiffs failed to complete the Hardship Affidavit section, which included a field for Plaintiffs' "Explanation" for their hardship, and did not submit page 4 of the RMA.

In addition, Nationstar states that by letter dated February 21, 2014, it requested a copy of Plaintiffs' "most recent signed filed federal tax return with all schedules, and as applicable, the business tax return." Plaintiffs did not provide a "signed" copy of their federal tax return and did not provide "all schedules."

Furthermore, Nationstar states that by letter dated February 21, 2014, it requested a copy of Plaintiffs' "most recent signed quarterly or year-to-date profit/loss statement," but that the profit/loss statement submitted by Plaintiffs was not signed.

By letter dated February 21, 2014, Nationstar also requested a copy of all rental/lease agreements, proof of receipt of rental income, and proof of the "principal, interest, property taxes, and insurance for each rental property"; however, Plaintiffs provided none of the requested information/documents on or before March 8, 2014.

5. Identify any and all Documents You believe were requested in Nationstar's October 31, 2013 letter to Bruce Craigie in connection with a "BoNY Trial Period" request, but were not received by Nationstar on or before February 26, 2014.

RESPONSE: Nationstar objects to this request as the letter dated October 31, 2013, is a written document that speaks for itself. Subject to and without waiving any objections, Nationstar states by letter dated October 31, 2013, it requested the following documents from Plaintiffs: Schedule E, Schedule C, RMA, most recent signed copy of tax return 1040s including all schedules, most recent quarterly or year to date profit and loss statement showing gross income expenses and net income, signed IRS 4506-T, financial worksheet, documentation for all sources of income. The October 31, 2013 letter stated that Plaintiffs needed to return these documents "no later than November 29, 2013 in order for Nationstar Mortgage to complete the review of your request." Plaintiffs failed to return any of these requested documents.

6. Identify any and all Documents which list the documents Nationstar required in order to consider a "BoNY Trial Period" request "complete."

RESPONSE: Nationstar refers Plaintiffs to the letters dated May 29, 2013 and October 31, 2013, previously produced and identified as NATIONSTAR 000565 and 000569.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Produce any and all Documents identified in Your answers to the foregoing Requests for Admission and Interrogatories.

RESPONSE: Nationstar refers Plaintiffs to documents previously produced and identified as NATIONSTAR 000565, 000569, and 000572-000609.

2. Produce each "pre-sale checklist" relating to Scenic Drive or Lake Drive.

RESPONSE: Nationstar objects because this request seeks documents that are protected from disclosure under attorney-client privilege and/or work product doctrine.

3. Produce each "hold report" relating to Scenic Drive or Lake Drive.

RESPONSE: Nationstar objects because this request seeks documents that are protected from disclosure under attorney-client privilege and/or work product doctrine.

4. Produce each "affidavit" and "affirmation" referenced in each "COLLECTION HISTORY PROFILE" for Lake Drive and Scenic Drive.

RESPONSE: Nationstar objects because this request seeks documents that are protected from disclosure under attorney-client privilege and/or work product doctrine.

DYKEMA GOSSETT PLLC

Dated: February 3, 2016

/s/Elisa J. Lintemuth

Elisa J. Lintemuth (P74498)

DYKEMA GOSSETT PLLC

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VERIFICATION

I, Kimberly Cavagnaro, state that I am a Assistant Secretary for Nationstar Mortgage LLC ("Nationstar"), that while I do not have personal knowledge of all the facts recited in the foregoing document, the statements and information made in the interrogatory responses have been collected and made available to me by counsel and employees of Nationstar and are made in reliance of business records; that the information contained herein is true and correct to the best of my knowledge and belief, and the interrogatory responses are therefore, verified.

I reserve the right to make changes to the responses if I discover that omissions or errors have been made or that more accurate information is available.

Kimberly Cavagnaro, Assistant Sec.
Kimberly Cavagnaro, Assistant Secretary

Nationstar Mortgage, LLC

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PROOF OF SERVICE

I hereby certify that on February 3, 2016, I caused to be served Objections and Responses to Plaintiffs' Second Set of Discovery Requests to Defendant Nationstar Mortgage LLC upon Plaintiffs' attorney at their address listed above by hand delivery.

Dated: February 3, 2016

/s/ Elisa J. Lintemuth

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